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November 8, 2018

VIA ECF

Honorable Freda L. Wolfson, U.S.D.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices and Products Liability Litigation

Case No. 3:16-md-02738-FLW-LHG

Dear Judge Wolfson,

As Your Honor is aware, the PSC and Imerys have recently raised a discovery issue regarding the document production and privilege log of Mr. William Kelly. I conducted a conference call with the PSC, Imerys, and Mr. Kelly's counsel on November 5, 2018. In order to determine whether I will need to review all 8,000 documents in dispute, the Parties have agreed to work together to narrow the issues and disputed documents. While the Parties seek to narrow and resolve the dispute, I have advised the Parties that I will hold the dispute in abeyance.

Please do not hesitate to contact me should you have any questions.

Respectfully submitted,

Joel A. Pisano

cc: All Counsel of Record via ECF